

Hearing Date: May 21, 2019
Hearing Time: 10:00 AM ET
Objection Deadline: May 14, 2019,
at 4:00 PM ET

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**NOTICE OF MOTION BY NINA AND GERALD GREENE
TO EXTEND APPLICATION OF FEDERAL RULE OF CIVIL
PROCEDURE 23 TO CLASS PROOFS OF CLAIM**

PLEASE TAKE NOTICE that a hearing on the Motion to Extend Application of Federal Rule of Civil Procedure 23 to Class Proofs of Claim (the “Motion”) filed by Movants/Class Representatives Nina and Gerald Greene will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 on **May 21, 2019 at 10:00 AM ET**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted pro hac vice, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, on a CD-ROM, in text searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399,

to the extent applicable, and shall be served in accordance with the Amended Order
Implementing Certain Notice and Case Management Procedures, entered on November 1, 2018
(Doc. No. 405), so as to be filed and received no later than **May 14, 2019 at 4:00 PM ET**.

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served
with respect to the Motion, the Movants may, on or after the objection deadline, submit to the
Bankruptcy Court a proposed order, which may be entered without further notice or opportunity
to be heard.

Dated: April 11, 2019

Respectfully submitted,

/s/ James P. Pagano

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